



American Dietetic Association
Your link to nutrition and health.sm

120 South Riverside Plaza, Suite 2000
Chicago, IL 60606-6995
800/877-1600
www.eatright.org

Policy Initiatives and Advocacy
1120 Connecticut Avenue, Suite 480
Washington, DC 20036-3989
202/775-8277 FAX 202/775-8284

June 7, 2005

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, Maryland 20852

ATTN:
Donald J. Carrington
Center for Food Safety and Applied Nutrition (HFS-666)
Food and Drug Administration
5100 Paint Branch Parkway
College Park, Maryland 20740

Re: [Docket No. 1998N-0359]
Program Priorities in the Center for Food Safety and Applied Nutrition;
Request for Comments

The American Dietetic Association (ADA) appreciates this opportunity to respond to the notice published by the Food and Drug Administration's (FDA) Center for Food Safety and Applied Nutrition (CFSAN) in the Federal Register on May 20, 2005 (Volume 70, Number 97, pages 29328-29329) requesting comments concerning the establishment of program priorities for fiscal year (FY) 2006. The ADA is the largest association of food and nutrition professionals in the nation, representing nearly 67,000 members serving the public through the promotion of optimal nutrition, health and well being.

General Comments

ADA supports CFSAN's program of work as outlined in the FY 2005 Program Priorities and would like to offer comments regarding section II of the work plan: Improving Nutrition and Dietary Supplement Safety. The cover letter by Dr. Brackett introducing the FY 2005 Program Priorities states that the priorities for that year were based on public input as well as input generated internally within the framework of **"Where do we do the most good for consumers and the overall public health?"** ADA believes the answer is not solely in the distribution of scientifically sound information, but through the creation and encouragement of responsible consumer education and by publically supporting nutrition education professionals as the individuals most qualified to deliver such education.

The American Dietetic Association actively monitored and participated in providing CFSAN input and commentary during the first half of FY 2005 in the agency's efforts to implement many of the stated priorities. During this process, ADA grew concerned that CFSAN's efforts to provide

information on labels for packaged food and beverage products to enable consumers to make more informed and healthier food product choices in the context of their daily diet is only partially achieving its regulatory mandate. Not because the effort to provide science-based information isn't being made; but because the FDA has the potential to demonstrate more fully a commitment to providing well designed, adequately funded and sustained consumer educational campaigns in support of the label. Improvements in the label information, without complementary education, will not bring about the behavioral changes in diet so greatly needed to address the growing incidence of obesity and other emerging health concerns.

In addition, ADA believes that CFSAN can directly help consumers by openly directing them to qualified nutrition education professionals who are trained in translating food and nutrition research and related information that consumers can understand and apply to self-directed goals to improve their food consumption behaviors and nutritional health. Therefore, ADA urges CFSAN to designate consumer education by qualified nutrition professionals, including the Registered Dietitian, as a stated priority for FY 2006.

Ensuring Food Safety and Defense

The ADA has taken the position that "the public has the right to a safe food and water supply. The Association supports collaboration among dietetics professionals, academics, representatives of the agricultural and food industries, and appropriate government agencies to ensure the safety of the food and water supply by providing education to the public and industry, promoting technologic innovation and applications, and supporting further research."¹ We learned by experience last summer from Florida, when four major storms displaced seniors from their homes, that foodborne illness and water contamination had a more lethal effect on this and other vulnerable populations than the hurricanes themselves. While we understand that FEMA was the key response agency under these circumstances, the FDA is an important advisor and partner in emergency preparedness.

Improving Nutrition and Dietary Supplement Safety

The ADA has the highest regard for CFSAN's regulatory responsibilities to protect the health of the public by ensuring that foods and other dietary substances are labeled with truthful and non-misleading information. It is the position of the American Dietetic Association that food and nutrition misinformation can have harmful effects on the health and economic status of consumers.² Nationally credentialed dietetics professionals working in healthcare, academia, public health, nutrition communications, media, and the food industry and serving in policy-making/regulatory roles are uniquely qualified to advocate for and promote sound, science-based nutrition information to the public, function as primary nutrition educators to health professionals, and actively counter and correct food and nutrition misinformation.

ADA also believes that nutrition information can be distributed widely, but it alone does not create an informed public capable of making food choices that promote optimum nutrition and weight management. Instead, this information needs to be translated within the context of the individual's cultural and physical environment. In many cases, this would involve an

¹ Food and Water Safety, Position of the American Dietetic Association. Accessed July 19, 2005:
http://www.eatright.org/Member/PolicyInitiatives/index_21043.cfm

² Food and Nutrition Misinformation, Position of the American Dietetic Association. Accessed July 19, 2005.
http://www.eatright.org/Member/PolicyInitiatives/index_21044.cfm

assessment of nutritional status. We know that an excess intake of calories does not equate with an excess, or even adequate, intake of nutrients. An obese individual can simultaneously be at risk for a wide variety of nutritional deficiencies.

Ensuring Food/Color Additive and Cosmetic Safety

ADA supports CFSAN's ongoing efforts of work in this area.

Ensuring Food Safety: Crosscutting Areas

Consumers underutilize Nutrition Facts Panel (NFP) information and report confusion in their attempts to fully utilize and translate the NFP panel information. ADA believes that a comprehensive approach to revising the food label should be considered and that studies be done to investigate the impact of changing the label on consumer behavior. The impact of changing the label on consumer behavior should be evaluated as part of a larger coordinated and integrated plan to maximize resources and to minimize the expenses inherent in the label revision process. Studies should include real-time observational designs as well as surveys.

ADA also emphasizes that information and education are not synonymous—they are complementary and synergistic. It will be the educational effort that determines how successfully consumers can understand and utilize label information to enhance and maintain healthy diet behaviors. This information would be best conveyed within the context of dietary guidance based on the 2005 Dietary Guidelines for Americans.

Priority Ongoing Activities

The ADA agrees with CFSAN's list of priority ongoing activities, particularly in the areas of food security and emergency preparedness. It is the position of the American Dietetic Association that the public has the right to a safe food and water supply. The Association supports collaboration among dietetics professionals, academics, representatives of the agricultural and food industries, and appropriate government agencies to ensure the safety of the food and water supply by providing education to the public and industry, promoting technologic innovation and applications, and supporting further research.³

In addition to the position papers cited above, ADA invites the FDA to access additional position papers on related food and nutrition safety topics at:
http://www.eatright.org/Member/PolicyInitiatives/index_21012.cfm.

For further information or clarification of the above comments, please contact Mary Hager, PhD, RD, Senior Manager, Regulatory Affairs, at 202-775-8277 or mhager@eatright.org.

Best regards,
/s/

M. Stephanie Patrick
Vice President, Policy Initiatives and Advocacy

³ Food and Water Safety, Position of the American Dietetic Association. Accessed July 19, 2005.
http://www.eatright.org/Member/PolicyInitiatives/index_21043.cfm